Clint Odom
Director
Federal Regulatory

veri<u>z</u>on

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2535
Fax 202 336-7922
clint.e.odom@verizon.com

January 7, 2002

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

> **RE: _Application by Verizon-New England Inc. for Authorization To Provide In-Region, InterLATA Services in State of Rhode Island, Docket No. 01-324_**

Dear Ms. Salas:

This letter responds to Staff's requests for additional information arising out of the meeting held on December 14 concerning Verizon's billing systems in Rhode Island and certain OSS enhancements related to offering resold DSL on resold voice lines (DRL).

Comparison of Rhode Island and Pennsylvania Billing Systems

There are two types of billing systems in the former Bell Atlantic service areas –CRIS (Customer Records Information System), which Verizon uses to bill its retail end user customers, and CABS (Carrier Access Billing System), which Verizon uses to bill its interexchange carrier customers for access. CRIS is a system that has long been used by Bell Operating Companies for billing end users. Prior to divestiture in 1984, as described in more detail below, there were five CRIS billing systems in what is now Verizon East (former Bell Atlantic). Each of the former operating telephone companies that existed prior to divestiture and that currently make up Verizon East had its own billing system. CABS was developed at divestiture to enable BOCs to render access bills.

Both CRIS and CABS were modified to enable Verizon to render wholesale bills to CLECs. _See_ McLean/Wierzbicki (RI) Decl. ¶ 102; McLean/Wierzbicki/Webster (PA) Decl. ¶ 128. After divestiture, the former Bell Atlantic North companies and the former Bell Atlantic South companies consolidated some of their billing systems. There are currently three CRIS and two CABS billing systems within the Verizon East service areas. One CRIS system serves NY, CT, MA, ME, NH, RI, & VT. A second CRIS system serves NJ, PA, & DE. The third CRIS system serves MD, DC, VA, & WV. One CABS system serves NY,

CT, MA, ME, NH, RI, & VT (former Bell Atlantic North) and the other serves NJ, PA, DE, MD, DC, VA, & WV (former Bell Atlantic South).

North States (NY, CT, MA, ME, NH, RI, VT)

Prior to divestiture, New England Telephone, covering MA, ME, NH, RI, and VT had a CRIS billing system and New York Telephone, which also covers CT, had a different CRIS billing system. Following divestiture, New England Telephone and New York Telephone became NYNEX. They consolidated their two CRIS systems into one and implemented one CABS (Carrier Access Billing System) billing system to handle access services. Currently, there is one CRIS billing system with two instances in order to distribute the work load, and one CABS billing system for the former Bell Atlantic North states. *See* McLean/Wierzbicki (RI) Decl. ¶ 13.

South States (NJ, PA, DE, DC, WV, VA, & MD)

Prior to divestiture, each of the three jurisdictions that became Bell Atlantic at divestiture had its own CRIS billing system. The three were: (1) New Jersey Bell; (2) the Bell Telephone Company of Pennsylvania and Diamond State Telephone (PA & DE); and (3) The Chesapeake and Potomac Telephone Companies (MD, DC, VA, WV). At divestiture Bell Atlantic implemented one CABS system to handle access services for all three companies, but there was no consolidation of CRIS at that time. In the early 1990s, NJ and PA/DE consolidated their CRIS systems into one. Currently in the former Bell Atlantic South, there are two CRIS systems and one CABS system covering the seven states. There are two instances of the CABS system to distribute the work load, but it is one CABS billing system. There is one instance of each of the CRIS systems.

Differences

Although the systems had common origins, each company maintained and updated its billing systems separately and on separate schedules. As a result, certain differences between the systems arose over time.

A key difference between the Rhode Island and Pennsylvania systems occurred when the billing systems were modified to accommodate wholesale billing. In the former Bell Atlantic North states, including Rhode Island, the decision was made to bill UNE platform using the CABS billing system. In the former Bell Atlantic South states, including Pennsylvania, the decision was made to bill UNE platform using the CRIS billing systems. *See* McLean/Wierzbicki (RI) Decl. ¶ 105; *see also* KPMG PA Final Report at 533 (Appendix B, Tab F2).

This difference was significant for the implementation of electronic bills in BOS BDT (Billing Output Specification – Bill Data Tape) format because CABS bills have long been produced in the BOS BDT format, whereas CRIS bills have been produced in proprietary formats (generally on paper) by each of the operating companies. Although there were good reasons supporting the separate decisions made by Bell Atlantic North and by Bell Atlantic South, the software programming required by the CABS programmers to accommodate UNE platform in BOS BDT – while complicated – turned out to be more easily accomplished than the software programming required by CRIS programmers to implement the BOS BDT formatting specification as another output for the CRIS billing system. As a result, the BOS BDT issues in Pennsylvania which arose in the context of UNE platform accounts did not affect Rhode Island billing.

As Verizon has demonstrated, and both KPMG and PwC have confirmed, the Rhode Island billing OSS are the same as the Massachusetts billing OSS, and the very CLECs that raised issues with respect to Verizon's BOS BDT billing in Pennsylvania applauded the quality of Verizon's BOS BDT billing in New

York and Massachusetts – the same billing system used to provide BOS BDT formatted bills to CLECs in Rhode Island. For example, WorldCom stated that: "In contrast [to Pennsylvania], in other states, including New York, WorldCom received auditable electronic bills from the time it initially entered the local residential market." WorldCom PA 271 Lichtenberg Reply Decl., CC Docket 01-138, ¶ 19 (FCC filed Aug. 6, 2001). Similarly, Z-Tel stated: "Verizon clearly has the know-how needed to transmit accurate bills to competitors, as evidenced by the fact that the billing problems in Pennsylvania do not exist in either Massachusetts or New York." Z-Tel PA 271 Comments, CC Docket 01-138, at 2 (FCC filed July 11, 2001); *see also* Z-Tel PA 271 Reply Comments, CC Docket No. 01-138, at 6 (FCC filed Aug. 6, 2001) ("Verizon knows how to make a billing system work, as evidenced by its performance in Massachusetts and New York.") In fact, *no* CLECs expressed concern about the quality of their BOS BDT bills in Rhode Island during the state proceedings.

OSS Enhancements for DRL Since Connecticut Order

As the Commission recognized in its Order approving Verizon's long distance application for Connecticut, Verizon had a manual ordering process in place at that time to begin taking orders for resold DSL over resold voice lines (DRL). Since then, Verizon has implemented a number of enhancements to its "core" OSS and to VADI's OSS to enable the ordering and provisioning systems to handle DRL orders. Attachment 1 to this letter is a chart setting out the enhancements that have been implemented through November. Despite these enhancements, in the former Bell Atlantic states where VADI operated, no reseller has submitted orders – other than test orders – to Verizon for DRL service. (In Pennsylvania, where Verizon conducted the test of DRL, the participating reseller submitted only 6 test orders that were intended to complete the entire provisioning process. Verizon successfully completed these orders.)

The Commission's Connecticut Order indicated a number of areas that it expected Verizon to address as permanent order processing procedures were implemented. First, the Commission stated that it expected permanent order processing procedures to eliminate the need to establish the reseller as the voice provider on the line before Verizon could process the DSL resale order. Verizon's order processing procedures are continuing to evolve. When voice and data are established on a single line, however, the voice provider controls the line, and the data provider is a sub-tenant. As a result, the voice service must be established first. This is true whether Verizon, a CLEC, or a reseller is the voice provider.

Moreover, as the tariff makes clear, the reseller of DSL must have a relationship with an ISP. When an end user's DSL service is established, that end user's service is mapped through the Advanced Data Network over a pre-established route, unique to each ISP, out to the serving ISP's POP (Point Of Presence or Router). If the end user moves from VADI to a reseller for its DSL service, the ISP relationship likely will change, even though the underlying DSL service is still provided by VADI. Therefore, VADI must re-route the service so the end user can reach the new ISP. This re-routing means that the resale of DSL is more complex than the relatively simple migration of voice service to a reseller, and prevents the simple "flip" of the voice and DSL "package" from Verizon to a reseller.

The Commission also stated that it expected permanent order processing procedures to eliminate the need to (temporarily) disconnect resold DSL if the end user switches from the reseller back to Verizon for the underlying voice service. Since Verizon has not received any production DRL orders, there are no lines in place with resold DSL and resold voice in any former Bell Atlantic state where VADI operated. As a result, Verizon has not received any orders where an end user seeks to switch its voice service back to Verizon while retaining the reseller providing DSL. Nevertheless, if such an order were received, Verizon would endeavor to complete the order without disconnection of the DSL service.

Finally, the Commission stated that Verizon's performance in providing DRL would ultimately be reflected in its performance data. As Attachment 1 makes clear, Verizon has implemented enhancements in

its systems to allow it to capture performance data for DRL service. To date, however, no performance measures specific to DRL have been developed in the state collaboratives.

Clarification of Flow Through Measures

Staff asked whether rejected orders are counted in the Carrier-to-Carrier flow through measures. For measures OR-5-01, OR-5-02, and OR-5-03 (% Flow Through – Total, Simple, and Achieved, respectively), the Carrier-to-Carrier Guidelines refer to "valid" orders. Since these flow through measures measure orders that progress from the interfaces and are accepted into the service order processor without manual intervention, they only count "confirmed" orders, because a rejected order is not accepted into the service order processor. Measures OR-2-01 and OR-2-02, however, measure the timeliness of returning reject notices for "flow through" orders. For these measures, only rejected orders are included, and the measures reflect the timeliness of reject notices returned without human intervention.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2746.

Sincerely,

Clint E. Odom

Attachment

cc: J. Veach
      J. Stanley
      G. Remondino
      C. Newcomb
      E. Yocus

Implementation of OSS Enhancements to Support
DSL over Resold Lines – DRL – in former Bell Atlantic

Date	Description	Jurisdiction
July 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	CT
August 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	PA DE DC MD VA WV
August 2001	Enhance VADI's OSS to generate a unique PON# for identification of LSRs for work flow and reporting	All
September 2001	Enhance VADI's reporting system to provide order status reporting to Resellers	All
October 2001	Enhance core OSS to allow for the acceptance and processing of line share orders on a resold voice line for VADI	MA ME NH NY RI VT
October 2001	Enhance VADI's Provisioning OSS to capture Reseller ID for Metric Reporting	All
November 2001	Enhance VADI's Maintenance Database to capture Reseller ID for Metric Reporting	All